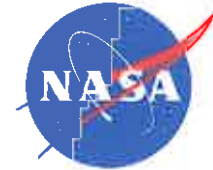


National Aeronautics and Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771



May 24, 2013

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel


Re: Widely Attended Gathering Determination Regarding Attendance at
Landsat 8 Commissioning Event in Sioux Falls, SD

FORWARD Sioux Falls, a joint venture economic development partnership between the Sioux Falls Area Chamber of Commerce and the Sioux Falls Development Foundation, is sponsoring post-launch reception to mark the event of Landsat 8 going operational. The event is a reception and ribbon-cutting ceremony scheduled for Thursday, May 30, 2013, to be held at the Holiday Inn City Centre in Sioux Falls, South Dakota. Approximately 250 individuals have been invited, including representatives from industry, state and local officials, Congress, NASA, and other Federal agencies. The cost per person of the reception is \$18.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event because attendance at the reception will allow NASA employees an opportunity to discuss NASA missions and programs, and in particular LDCM, with the other guests. Accordingly, NASA employees whose duties do not substantially affect the event sponsor may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties substantially affect the event sponsors, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsor the cost of the food and refreshments they and their guests consume at the reception.

NASA attendees are reminded of the \$20 gift exception at 5 CFR 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). We understand that Ball will distribute books of commemorative Landsat stamps, approximately valued at \$6 per book.



R. Andrew Falcon